

ANDERSON KILL P.C.

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Via ECF

August 13, 2021

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD)(SN)*

Dear Judge Netburn:

I write on behalf of Anderson Kill P.C. ("Anderson Kill"), in response to the Kingdom of Saudi Arabia's under seal request (ECF No. 6981) for judicial intervention and the Court's August 12, 2021 Order (ECF No. 7011) regarding the apparent release of the transcript of Mussaed al Jarrah. While not directed to do so, we had previously prepared declarations¹ and are voluntarily submitting them to the Court to offer the Court additional information from the internal investigation Anderson Kill conducted immediately upon learning of Michael Isikoff's July 15, 2021 article in Yahoo! News, entitled "FBI tried to flip Saudi official in 9/11 investigation." Based on our internal review, Anderson Kill remains confident that no one at Anderson Kill, or at Anderson Kill's direction, disclosed the redacted transcript referenced in Mr. Isikoff's article.

Without waiving any right, privilege, immunity, or other protection, the following declarations were executed by individuals at Anderson Kill (three attorneys and a paralegal) who received and/or had access to the transcripts and from the Anderson Kill IT department director who promptly reviewed the matter commencing on the day that the Isikoff article was published:

- Declaration of Jerry S. Goldman, Esq.;
- Declaration of Robert M. Horkovich, Esq.;
- Declaration of Bruce Strong, Esq.;
- Declaration of Emily Rybicki (paralegal); and,
- Declaration of Robin Pramanand (IT Director).

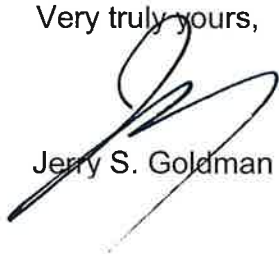
¹ I arranged for the declarations to be prepared and executed on July 29 and 30, 2021, prior to my departure on a vacation outside of the country.

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Although we anticipate that the accompanying declarations show that Anderson Kill was not the source of any unauthorized disclosure, we are prepared to address any additional inquiries that the Court may have and thank the Court for its attention to this matter.

Very truly yours,



Jerry S. Goldman

Enclosures

cc: All Counsel by ECF